

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re: Vicky Rodríguez-Torres
Debtor

Vicky Rodríguez-Torres
Plaintiff

v.

Enid López-López
Guillermo Camba-Casas
Mariela Rexach-Rexach
Government Development Bank PR, et al.
Defendants

09-10864-BKT7

Chapter 7

ADVERSARY PROCEEDING

10-00137-BKT

18 U.S.C. § 1030,

18 U.S.C. § 2510,

18 U.S.C. § 2701,

42 U.S.C. § 1983,

42 U.S.C. § 1985,

42 U.S.C. § 1988,

TORTS

MOTION FOR LEAVE TO FILE SEPARATE
Fed. R. Bankr. P.7026-1(c)DISCOVERY PLAN

TO THE HONORABLE COURT:

Now comes Debtor, through the undersigned attorney, and respectfully alleges and prays as follows:

1. On September 29th, 2010, Debtor filed a motion requesting an extension of time to comply with the requirements as set forth by **Fed. R. Civ. P.26(a)(1)** and **L. R. Bankr. P.7026-1**. See: **ECF No. 15**.
2. On October 5th, 2010, the Court granted the above mentioned motion, ordering compliance by October 15th, 2010. See: **ECF No. 24**.
3. Both parties have complied with their initial disclosures by October 15th, 2010.

4. On October 14th, 2010, the undersigned forwarded to counsel for appearing co-defendants a proposed Discovery Plan, substantially conforming with **LBF K**, requesting their input in furtherance of a joint filing by the October 15th, 2010, deadline.
5. Counsel for appearing co-defendants, consistent with what they had shared with the undersigned during their tele-conference held on October 13th, 2010, confirmed on this date that they will be moving this Honorable Court to continue the discovery process in the instant case.
6. The undersigned, on the other hand, is prepared to file a proposed Discovery Plan without the benefit of any insight or participation from co-defendants.
7. Therefore, in order to be in compliance with the deadline set by the Order in **ECF No. 24**, the undersigned requests that Debtor be allowed to file a separate Discovery Plan on this date.
8. The proposed Discovery Plan is included herewithin as **Exhibit 1**.

WHEREFORE, for all of the above, Debtor prays that this Honorable Court:

GRANT Debtor leave to file a separate **L. R. Bankr. P.7026-1(c)** Discovery Plan, and deem Debtor in compliance with the Order as set forth in **ECF No. 24**.

Submitted in New York, New York, this 15th day of October, 2010.

S/William E. Meléndez Menéndez

William E. Meléndez Menéndez

USDC PR No. 226902

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties in interest.

In New York, New York, this 15th day of October, 2010.

S/William E. Meléndez Menéndez

William E. Meléndez Menéndez

USDC PR No. 226902